

Law Offices

MORGAN, LEWIS & BOCKIUS LLP

101 Park Avenue

New York, New York 10178

(212) 309-6000

*Attorneys for Defendants Jones Lang LaSalle Americas, Inc.,
Peter Riguardi, and Stephen Schlegel*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YORON COHEN,

Plaintiff,

v.

**JONES LANG LASALLE AMERICAS,
INC., PETER RIGUARDI,
and STEPHEN SCHLEGEL,**

Defendants.

CIVIL ACTION NO. 17-cv-03471 (DLC)

ELECTRONICALLY FILED

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION FOR ISSUANCE OF LETTERS ROGATORY**

Defendants Jones Lang LaSalle Americas, Inc. ("JLL"), Peter Riguardi ("Riguardi"), and Stephen Schlegel ("Schlegel") (together, "Defendants"), by and through their attorneys, Morgan, Lewis & Bockius LLP, hereby respond to Plaintiff Yoron Cohen's ("Plaintiff") Motion for Issuance of Letters Rogatory as to Third Party Gavin Morgan (the "Motion").

In the interests of preserving judicial resources, Defendants do not oppose Plaintiff's Motion insofar as it complies with this Court's rules and the Hague Convention of 18 March 1970 on The Taking of Evidence Abroad in Civil or Commercial Matters. Defendants, however, object to Plaintiff's misleading and/or incomplete allegations concerning Mr. Morgan and Defendants, including the allegations in Section 7 of Plaintiff's Request for International Judicial Assurances to Obtain Evidence in the United Kingdom (the "Request," Dkt. No. 40-1). Defendants further object to Plaintiff's assertions regarding Mr. Morgan's

alleged involvement in the conduct alleged in the Amended Complaint and the relevance of the proposed subjects of Mr. Morgan's oral examination to this action. For these reasons, Defendants have submitted for the Court's consideration a revised version of the Request, attached as Exhibit 1, that more accurately reflects Defendants' position. Defendants' proposed revisions also remove superfluous language from the Request that appears intended to put the Court's imprimatur on the validity of Plaintiff's claims and allegations concerning Mr. Morgan. For reference, a document showing Defendants' proposed revisions is attached as Exhibit 2.

Should the Court grant Plaintiff's Motion, Defendants reserve all rights to oppose Plaintiff's request to examine Mr. Morgan in the appropriate forum in the United Kingdom and otherwise reserve their rights to object to the subject matter of Mr. Morgan's examination.

Dated: January 10, 2018

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jason D. Burns

Jason D. Burns

Michael L. Banks
Jason D. Burns
101 Park Avenue
New York, NY 10178
Tel: (212) 309-6000
Fax: (212) 309-6001
jason.burns@morganlewis.com

Attorneys for Defendants